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10 ACCESS MEDICAL, LLC and
11 ROBERT CLARK WOOD, II

12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 NAUTILUS INSURANCE COMPANY,

16 Plaintiff,

17 vs.

18 ACCESS MEDICAL, LLC; ROBERT
19 CLARK WOOD, II; FLOURNOY
20 MANAGEMENT, LLC; and DOES 1-10,
21 inclusive,

22 Defendants.

23 Case No.: 2:15-CV-00321-JAD-BNW

24
25 **STIPULATION AND [PROPOSED] ORDER**
EXTENDING DEADLINE FOR
DEFENDANT'S ACCESS MEDICAL, LLC
AND ROBERT CLARK WOOD, II TO
RESPOND TO PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR SUMMARY
JUDGMENT FOR REIMBURSEMENT
AGAINST ACCESS MEDICAL, LLC AND
ROBERT CLARK WOOD, II [ECF 178] AND
PLAINTIFF'S DEADLINE TO FILE ITS
REPLY

26 Plaintiff, Nautilus Insurance Company ("Nautilus") by and through its counsel SELMAN
27 BREITMAN LLP, and Access Medical, LLC, and Robert Clark Wood, II, (collectively the
28 "Insureds"), by and through their counsel THE SCHNITZER LAW FIRM hereby submit the
following Stipulation and Order extending the deadline for the Insureds to file its Response to
Nautilus's Notice of Motion and Motion for Summary Judgment for Reimbursement against
Access Medical, LLC and Robert Clark Wood, II ("Motion") [ECF 178].



1 In light of the Motion being filed while the Insureds' counsel was on vacation, Nautilus
2 has extended a professional courtesy in agreeing to allow the Insureds an additional week to
3 respond to the Motion. The Insureds response to the Motion will be due on May 4, 2022.

4 As a professional courtesy and consideration for Nautilus' counsel agreeing to allow the
5 Insureds an additional week to respond to the Motion, Nautilus shall have an additional week to
6 reply to the Insureds response. Nautilus' reply to response to the Motion will be due on May 25,
7 2022.

8 **IT IS SO STIPULATED.**

9 DATED: April 27, 2022.

THE SCHNITZER LAW FIRM

10 By: /s/ Jordan P. Schnitzer, Esq.
11 JORDAN P. SCHNITZER
12 Nevada Bar No. 10744
13 9205 W. Russell Road, Suite 240
14 Las Vegas, NV 89148
15 *Attorney for Defendants,*
16 *ACCESS MEDICAL, LLC and*
17 *ROBERT CLARK WOOD, II*

18 DATED: April 27, 2022.

SELMAN BREITMAN LLP

19 By: /s/ Samuel E. Lipsitz, Esq.
20 CASEY J. QUINN
21 Nevada Bar No. 11248
22 LINDA WENDELL HSU (PRO HAC VICE)
23 California Bar No. 162971
24 SAMUEL E. LIPSITZ (PRO HAC VICE)
25 California Bar No. 331407
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28 *Attorneys for Plaintiff*
 NAUTILUS INSURANCE COMPANY

29 **ORDER**

30 **IT IS SO ORDERED.**

31 DATED: April 28, 2022

32 _____
33 UNITED STATES JUDGE

